

Message

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**From:** Howard, Jodi [Howard.Jodi@epa.gov]  
**Sent:** 4/2/2019 2:06:40 PM  
**To:** Ostrand, Laurie [Ostrand.Laurie@epa.gov]  
**Subject:** RE: Subpart LLL question - Affected facility

OK

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**From:** Ostrand, Laurie  
**Sent:** Tuesday, April 2, 2019 10:06 AM  
**To:** Howard, Jodi <Howard.Jodi@epa.gov>  
**Subject:** RE: Subpart LLL question - Affected facility

I'm not sure its been discussed.

Laurie Ostrand  
U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

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**From:** Howard, Jodi  
**Sent:** Tuesday, April 2, 2019 8:05 AM  
**To:** Ostrand, Laurie <Ostrand.Laurie@epa.gov>  
**Subject:** RE: Subpart LLL question - Affected facility

Who will issue ADs going forward?

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**From:** Ostrand, Laurie  
**Sent:** Tuesday, April 2, 2019 9:58 AM  
**To:** Howard, Jodi <Howard.Jodi@epa.gov>  
**Subject:** RE: Subpart LLL question - Affected facility

It's supposed to be 4/14/19. But apparently other region's reorgs have been delayed. Although we've not been informed about a delay yet.

Laurie Ostrand  
U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

---

**From:** Howard, Jodi  
**Sent:** Tuesday, April 2, 2019 7:35 AM  
**To:** Ostrand, Laurie <Ostrand.Laurie@epa.gov>  
**Subject:** RE: Subpart LLL question - Affected facility

Laurie,

When will your reorg be completed?

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**From:** Ostrand, Laurie  
**Sent:** Tuesday, April 2, 2019 9:19 AM  
**To:** Mia, Marcia <[Mia.Marcia@epa.gov](mailto:Mia.Marcia@epa.gov)>; Marsh, Karen <[Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov)>  
**Cc:** Hambrick, Amy <[Hambrick.Amy@epa.gov](mailto:Hambrick.Amy@epa.gov)>; Howard, Jodi <[Howard.Jodi@epa.gov](mailto:Howard.Jodi@epa.gov)>; Patefield, Scott <[Patefield.Scott@epa.gov](mailto:Patefield.Scott@epa.gov)>  
**Subject:** RE: Subpart LLL question - Affected facility

## Ex. 5 Deliberative Process (DP)

Let me talk with Scott.

Laurie Ostrand  
U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

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**From:** Mia, Marcia  
**Sent:** Tuesday, April 2, 2019 6:37 AM  
**To:** Ostrand, Laurie <[Ostrand.Laurie@epa.gov](mailto:Ostrand.Laurie@epa.gov)>; Marsh, Karen <[Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov)>  
**Cc:** Hambrick, Amy <[Hambrick.Amy@epa.gov](mailto:Hambrick.Amy@epa.gov)>; Howard, Jodi <[Howard.Jodi@epa.gov](mailto:Howard.Jodi@epa.gov)>; Patefield, Scott <[Patefield.Scott@epa.gov](mailto:Patefield.Scott@epa.gov)>  
**Subject:** RE: Subpart LLL question - Affected facility

## Ex. 5 Deliberative Process (DP)

Marcia B Mia  
Air Branch  
Office of Compliance  
2227A WJCS  
U.S. Environmental Protection Agency  
202-564-7042

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**From:** Ostrand, Laurie  
**Sent:** Monday, April 01, 2019 4:30 PM  
**To:** Mia, Marcia <[Mia.Marcia@epa.gov](mailto:Mia.Marcia@epa.gov)>; Marsh, Karen <[Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov)>  
**Cc:** Hambrick, Amy <[Hambrick.Amy@epa.gov](mailto:Hambrick.Amy@epa.gov)>; Howard, Jodi <[Howard.Jodi@epa.gov](mailto:Howard.Jodi@epa.gov)>; Ostrand, Laurie

<Ostrand.Laurie@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>

**Subject:** RE: Subpart LLL question - Affected facility

# Ex. 5 Deliberative Process (DP)

Laurie Ostrand  
U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

---

**From:** Mia, Marcia

**Sent:** Wednesday, March 27, 2019 12:24 PM

**To:** Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>

**Cc:** Hambrick, Amy <Hambrick.Amy@epa.gov>; Howard, Jodi <Howard.Jodi@epa.gov>

**Subject:** RE: Subpart LLL question - Affected facility

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**From:** Ostrand, Laurie

**Sent:** Wednesday, March 27, 2019 2:19 PM

**To:** Mia, Marcia <Mia.Marcia@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>

**Cc:** Hambrick, Amy <Hambrick.Amy@epa.gov>; Howard, Jodi <Howard.Jodi@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>

**Subject:** FW: Subpart LLL question - Affected facility

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Laurie Ostrand  
U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

---

**From:** Ostrand, Laurie  
**Sent:** Tuesday, March 26, 2019 1:04 PM  
**To:** Mia, Marcia <[Mia.Marcia@epa.gov](mailto:Mia.Marcia@epa.gov)>; Marsh, Karen <[Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov)>; Hambrick, Amy <[Hambrick.Amy@epa.gov](mailto:Hambrick.Amy@epa.gov)>  
**Cc:** Howard, Jodi <[Howard.Jodi@epa.gov](mailto:Howard.Jodi@epa.gov)>; Patefield, Scott <[Patefield.Scott@epa.gov](mailto:Patefield.Scott@epa.gov)>; Ostrand, Laurie <[Ostrand.Laurie@epa.gov](mailto:Ostrand.Laurie@epa.gov)>  
**Subject:** RE: Subpart LLL question - Affected facility

# Ex. 5 Deliberative Process (DP)

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U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

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**From:** Mia, Marcia  
**Sent:** Tuesday, March 26, 2019 12:20 PM  
**To:** Ostrand, Laurie <[Ostrand.Laurie@epa.gov](mailto:Ostrand.Laurie@epa.gov)>; Marsh, Karen <[Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov)>; Hambrick, Amy <[Hambrick.Amy@epa.gov](mailto:Hambrick.Amy@epa.gov)>  
**Cc:** Howard, Jodi <[Howard.Jodi@epa.gov](mailto:Howard.Jodi@epa.gov)>; Patefield, Scott <[Patefield.Scott@epa.gov](mailto:Patefield.Scott@epa.gov)>  
**Subject:** RE: Subpart LLL question - Affected facility

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**From:** Ostrand, Laurie  
**Sent:** Tuesday, March 26, 2019 11:04 AM  
**To:** Mia, Marcia <Mia.Marcia@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>  
**Cc:** Howard, Jodi <Howard.Jodi@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>  
**Subject:** RE: Subpart LLL question - Affected facility

Hi Marcia, Karen and Jodi

I received a formal applicability determination on the issue discussed below. See attached. The letter also contains a copy of ADI #0500057 (see: [https://cfpub.epa.gov/adi/index.cfm?fuseaction=home.dsp\\_show\\_file\\_contents&CFID=97094699&CFTOKEN=24303669&id=0500057](https://cfpub.epa.gov/adi/index.cfm?fuseaction=home.dsp_show_file_contents&CFID=97094699&CFTOKEN=24303669&id=0500057)), which pertains to the same source. WRT to the prior ADI, the source indicates that they requested the prior interpretation when they assumed the facility was subject to Subpart LLL. Now they think otherwise.

## Ex. 5 Deliberative Process (DP)

Thanks

Laurie Ostrand  
U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

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**From:** Mia, Marcia  
**Sent:** Thursday, February 21, 2019 11:36 AM  
**To:** Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>  
**Cc:** Howard, Jodi <Howard.Jodi@epa.gov>  
**Subject:** RE: Subpart LLL question - Affected facility

Hi Laurie  
I still owe you something on your tanks question – SORRY.

But Karen focused my attention on this one today, so I had some thoughts.

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

Marcia B Mia  
Air Branch  
Office of Compliance  
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U.S. Environmental Protection Agency  
202-564-7042

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**From:** Ostrand, Laurie  
**Sent:** Thursday, February 21, 2019 8:21 AM  
**To:** Marsh, Karen <[Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov)>; Mia, Marcia <[Mia.Marcia@epa.gov](mailto:Mia.Marcia@epa.gov)>  
**Cc:** Howard, Jodi <[Howard.Jodi@epa.gov](mailto:Howard.Jodi@epa.gov)>; Ostrand, Laurie <[Ostrand.Laurie@epa.gov](mailto:Ostrand.Laurie@epa.gov)>  
**Subject:** RE: Subpart LLL question - Affected facility

Hi Karen

WY DEQ is wondering where we stand on the issue. See email attached.

Any thoughts on what I should tell her?

Thanks

Laurie Ostrand  
U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

---

**From:** Marsh, Karen  
**Sent:** Friday, February 15, 2019 10:20 AM  
**To:** Ostrand, Laurie <[Ostrand.Laurie@epa.gov](mailto:Ostrand.Laurie@epa.gov)>; Mia, Marcia <[Mia.Marcia@epa.gov](mailto:Mia.Marcia@epa.gov)>  
**Cc:** Howard, Jodi <[Howard.Jodi@epa.gov](mailto:Howard.Jodi@epa.gov)>  
**Subject:** RE: Subpart LLL question - Affected facility

# Ex. 5 Deliberative Process (DP)

I'm adding Jodi in case she has any additional thoughts since she was involved with OOOO and OOOOa originally.

\*\*\*\*\*

Karen R. Marsh, PE  
US EPA, OAQPS, Sectors Policies and Programs Division  
Fuels and Incineration Group  
109 TW Alexander Drive, Mail Code E143-05  
Research Triangle Park, NC 27711  
Direct: (919) 541-1065; email: [marsh.karen@epa.gov](mailto:marsh.karen@epa.gov)

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**From:** Ostrand, Laurie  
**Sent:** Friday, February 15, 2019 12:16 PM  
**To:** Marsh, Karen <[Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov)>; Mia, Marcia <[Mia.Marcia@epa.gov](mailto:Mia.Marcia@epa.gov)>  
**Cc:** Ostrand, Laurie <[Ostrand.Laurie@epa.gov](mailto:Ostrand.Laurie@epa.gov)>  
**Subject:** RE: Subpart LLL question - Affected facility

Thanks Karen

## Ex. 5 Deliberative Process (DP)

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U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437

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**From:** Marsh, Karen  
**Sent:** Friday, February 15, 2019 10:08 AM  
**To:** Ostrand, Laurie <[Ostrand.Laurie@epa.gov](mailto:Ostrand.Laurie@epa.gov)>; Mia, Marcia <[Mia.Marcia@epa.gov](mailto:Mia.Marcia@epa.gov)>  
**Subject:** RE: Subpart LLL question - Affected facility

Hi Laurie,

## Ex. 5 Deliberative Process (DP)

Karen

\*\*\*\*\*

Karen R. Marsh, PE  
US EPA, OAQPS, Sectors Policies and Programs Division  
Fuels and Incineration Group  
109 TW Alexander Drive, Mail Code E143-05  
Research Triangle Park, NC 27711  
Direct: (919) 541-1065; email: [marsh.karen@epa.gov](mailto:marsh.karen@epa.gov)

---

**From:** Ostrand, Laurie  
**Sent:** Thursday, February 14, 2019 10:06 AM

**To:** Mia, Marcia <Mia.Marcia@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>

**Cc:** Ostrand, Laurie <Ostrand.Laurie@epa.gov>

**Subject:** Subpart LLL question - Affected facility

Hi Marcia and Karen

A WY DEQ permitter called regarding LLL applicability.

A facility currently has a permit making it subject to LLL. The facility is not a natural gas processing plant (extracts or fractionates NGLs). WY DEQ has interpreted LLL to apply to any facility that processes natural gas and has a sweetening unit.

However, OOOO says that the applicability is to “sweetening units located at onshore natural gas processing plants” (60.5365(g)) and onshore natural gas processing plant is defined as “means any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both. . . .” Now the facility thinks it should not be subject to LLL since OOOO only applies at natural gas processing plants.

## Ex. 5 Deliberative Process (DP)



# **Ex. 5 Deliberative Process (DP)**

Thanks for your help.

Laurie Ostrand  
U.S. Environmental Protection Agency  
8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202  
303-312-6437